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April 21, 2023

VIA CM/ECF

Hon. Michael A. Hammer, U.S.M.J.
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street Room 4015
MLK 2C
Newark, NJ 07101

Re: *Emerson Redevelopers Urban Renewal, LLC v. Borough of Emerson, et al.*
Docket No.: 2:20-cv-04728-MCA-MAH

Dear Judge Hammer,

We represent Plaintiffs and write jointly with Defendants pursuant to the Court's Order to submit an amended schedule for the remainder of discovery on or before April 21, 2023. The parties propose the following schedule:

Event	Proposed Date
Conclusion of Fact Discovery	May 22, 2023
Deadline for expert reports on any issue for which the party bears a burden of proof	June 30, 2023
Responsive expert reports	August 7, 2023
Expert depositions	September 7, 2023

If this schedule meets with Your Honor's approval, the parties request that the Court "so order" this letter.

SO ORDERED

s/Michael A. Hammer
Michael A. Hammer, U.S.M.J.

Date: 4/24/23

Hon. Michael A. Hammer, U.S.M.J.
April 21, 2023
Page 2

We thank Your Honor for your courtesies in this matter.

Respectfully submitted,

s/Stephen M. Klein

Stephen M. Klein

All counsel of record (via CM/ECF)